



FEDERAL ELECTION COMMISSION
Washington, DC 20463

1 **MEMORANDUM**

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3 **TO:** The Commission

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5 **FROM:** Lisa J. Stevenson
6 Acting General Counsel

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8 Kathleen M. Guith
9 Associate General Counsel for Enforcement

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11 Stephen Gura
12 Deputy Associate General Counsel for Enforcement

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14 **BY:** Mark D. Shonkwiler
15 Assistant General Counsel

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17 Kimberly D. Hart *KDH*
18 Attorney

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20 **SUBJECT:** MUR 7472 (Barletta, *et al.*)
21 Pre-Probable Cause Conciliation Agreement
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23 On August 7, 2018, the Commission found reason to believe that Barletta Engineering
24 Corporation, First Fidelity Corp., and Adphalt Corp. violated 52 U.S.C. §§ 30118(a) and 30122,
25 and 11 C.F.R. §§ 110.4(b)(1) and 114.2(b); and Vincent Barletta violated 52 U.S.C. §§ 30118(a)
26 and 30122, and 11 C.F.R. § 114.2(e), by using corporate funds to make \$39,800 in contributions
27 in the names of others between 2011 and 2015. The Commission also authorized pre-probable
28 cause conciliation with Respondents and approved a single joint conciliation agreement for all
29 respondents.¹ Attached is the conciliation agreement negotiated with Respondents, signed by
30 their counsel, which would resolve the violations.² We recommend the Commission accept the
31 signed agreement.
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¹ Certification, MUR 7472 (Aug. 7, 2018).

² Attach. 1.

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As such, we recommend that the Commission accept the negotiated conciliation agreement and close the file in this matter.

RECOMMENDATIONS:

1. Accept the attached conciliation agreement;
2. Approve the appropriate letters; and
3. Close the file.

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